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June 11, 2013

Via Electronic Mail

Honorable Jesse M. Furman
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, New York 10007

Application GRANTED.

SO ORDERED.



Jesse M. Furman
United States District Judge

Re: United States v. Vadim Trinch
13 Cr. 268 (JMF)

June 12, 2013

Dear Judge Furman:

On May 10, 2013, Your Honor set conditions of release for Vadim Trinch. On May 28, 2013, the defendant, with the government's consent, sought to amend the conditions of release such that certain identified parties (five in number) would co-sign the \$10,000,000 personal bond, along with the defendant's wife and two adult sons, and certain persons (including an individual named Kenneth Bordewick) would post real estate to secure Mr. Trinch's release. The Court allowed the requested modification. To date, all eight persons have signed the bond as required and all real estate has been posted, with the exception of one, that being a property with equity of approximately \$500,000, owned in trust by Mr. Bordewick. Even absent the posting of Mr. Bordewick's property, the real estate posted to date has a total available equity of approximately \$4,990,000 (\$19,690,000 if the Trinch's two properties are also included), substantially more than previously predicted, and each of those properties have been the subject of recorded liens in the form required by the domicile jurisdictions (*i.e.*, deeds of trust, mortgages and/or confessions of judgment).

On today's date, undersigned counsel requested that the Government agree to remove Mr. Bordewick as a party posting real estate and accept a substitution of equally valued properties from another party, Flora Yankelevich. The government has so consented. As such, I would respectfully request a modification of the Court's release order, such that Flora Yankelevich is permitted to post real estate to secure Mr. Trinch's release in place of Kenneth Bordewick, with all other conditions remaining intact.

Respectfully Yours,

Martin G Weinberg